

2001-014-714

Ronald D. Sugar
Corporate Vice President,
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NORTHROP GRUMMAN

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July 2, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW
Room 4035
Washington, D.C. 20405
Attention: Laurie Duarte

Reference: FAR Case 2001-014

Dear Ms. Duarte:

I appreciate this opportunity to respond to the FAR Council on the final rule "Contractor Responsibility, Labor Relations Costs, and Costs Relating to Legal and Other Proceedings." Litton Industries, Inc. Sector, Northrop Grumman Corporation, strongly opposes this rule and supports its revocation.

There are many reasons for our position, many of which have been submitted in coordination with the associations representing our industry.

I am particularly concerned that this burdensome rule has the potential to add unnecessary cycle time and cost to an already cumbersome and lengthy process for providing our military service men and women with the best equipment and systems in the world. The imposition of ambiguous rules for determining contractor responsibility is not in their best interests, nor to the Acquisition professionals that conduct Federal procurement.

I believe that the rule seriously impairs a fair and consistent application of procurement standards. It would create a broad ranging, ambiguous and inconsistent mechanism for Contracting Officers and procurement officials to implement. It will also be onerous for industry to comply with such sweeping requirements. More importantly, the rule, if re-instituted, would be a significant step backwards for the federal procurement process.



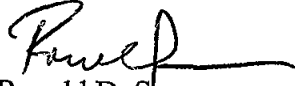
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We, therefore, strongly urge that the regulation changes be revoked totally, and not be reissued.

Sincerely,


Ronald D. Sugar